

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

A.J. & Q.C.,

Plaintiffs,

v.

MASP, LLC,

Defendant.

CIVIL ACTION FILE

NO. 1:23-cv-4247-JPB

**PLAINTIFFS' NOTICE OF FILING EXHIBITS FOR PLAINTIFFS'  
BRIEF IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY  
JUDGMENT**

Plaintiffs file this Notice of Filing Summary Judgment Exhibits as it relates to Plaintiffs' Brief in Support of Plaintiffs' Motion for Summary Judgment to assist the Court in its review of the evidence that Plaintiffs cite in their Motion for Summary Judgment. Pursuant to Local Rule 56.1(B)(2), Plaintiffs are also filing a statement of facts which Plaintiffs contend are material and present a genuine issue for trial.

In all of Plaintiffs' filings, Plaintiffs refer to the evidence in the record that is attached to this Notice and listed below by exhibit numbers. Where Plaintiffs cite to these exhibits in their filings, Plaintiffs do so with reference to these exhibit numbers, which will mostly be found with specific record citations.

In addition, many of the exhibits listed below contain either confidential information or information prohibited from being filed publicly. As noted below,

Plaintiffs filed only the redacted versions of such documents. Consistent with the Local Rules and per the Judge's Standing Order, Plaintiffs are filing a motion to seal the unredacted, full copies of any such documents and will be provisionally filing those documents under seal.

Finally, because of technical restrictions, Plaintiffs are filing these exhibits in batches and noting in the title of each notice the range of exhibits included in that batch. The exhibits include the following documents:

<b>Ex. No.</b>	<b>Description</b>	<b>Redacted or Requested to be Sealed</b>
1	May 22, 2013 Incident Report	Redacted; Under Seal
2	A.J. Deposition	Redacted excerpts; Under seal
3	Q.C. Deposition	Redacted excerpts; Under Seal
4	Indictment of Craig Hill and Tkeyah Adams	Redacted; Under seal
5	Warrant Application Affidavit	Redacted; Under seal
6	Case Disposition Summary	Redacted; Under seal
7	Plea Hearing Transcript	Redacted excerpts; Under seal
8	Det. Lewis Investigative Summary	Redacted; Under seal
9	Application for Criminal Arrest Warrant	Redacted; Under seal
10	Det. Simonds Investigative Summary	Redacted; Under seal
11	A.J. Written Statement	Redacted; Under seal

12	Q.C. Written Statement	Redacted; Under seal
13	Tkeyah Adams Suspect Interview Summary	Redacted; Under seal
14	Affidavit and Application for a Search Warrant	Redacted; Under seal
15	State v. Hill, No. 2013CR02540-06, Final Disposition	Redacted; Under seal
16	MASP, LLC 30(b)(6) Deposition	Excerpts
17	Def. MASP, LLC's Resps. to Pls' First Cont'g Reqs for Prod. of Docs	Redacted; Under seal
18	Map Layout	
19	Baldev Patel Declaration	
20	Narmada Patel Declaration	
21	Shilpa Patel Declaration	
22	Def. MASP, LLC's Responses to Pls' Fr. Cont'g Interrogatories	

Respectfully submitted this 11<sup>th</sup> day of October, 2024.

ANDERSEN, TATE & CARR, P.C.

*/s/ Jonathan S. Tonge*

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## CERTIFICATE OF COMPLIANCE

Under Local Rules 5.1(C) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font type and size requirements and is formatted in Times New Roman, 14-point font.

ANDERSEN, TATE & CARR, P.C.

*/s/ Jonathan S. Tonge*

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## CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the attorneys of record.

Respectfully submitted this 11th day of October, 2024.

ANDERSEN, TATE & CARR, P.C.

*/s/ Jonathan S. Tonge*

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